

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Bankruptcy No. 19-22237-CMB

ADELITA ENTERPRISES, INC.,

Chapter 11

Debtor.

RESPONSE & OBJECTIONS TO ORDER DISMISSING CASE

AND NOW, this 30th day of July, 2019, whereas a Order Dismissing the above case was filed by Honorable Judge Bohm on 7-18-2019, the Debtor, Adelita Enterprises Inc, responds and objects to the Dismissal Order as follows:

1. The Debtor is a two real estate asset entity and both real estate are producing rental income. Debtor lists only two assets: real property located at 834 Washington Road, Pittsburgh, PA 15228 and 201 Birch Avenue, Pittsburgh, PA 15243
2. It is unclear why the Debtors Petition shows no income. A new lease has been sent to tenant at 210 Birch. This lease amount monthly \$1500 should be sufficient to pay the mortgage and taxes and debts related to the property.
3. Adelita Enterprises Inc proposes paying \$2500 to \$3000 a month. This should be sufficient to cover the secured creditors and taxing bodies.
4. In the case of MSAMN, the Debtors Principle drafted a plan and asked counsel for MSAMN at the time to file the plan but counsel did not do so and let case convert to Chapter 7.
5. Due to the income from the rentals, a chapter 11 plan is very feasible.
6. The Debtor is not happy about its current counsel withdrawing. The counsel made promises that they are confident in confirming a chapter 11 plan and withdrew abruptly. However, Debtor is talking to New counsel including but not limited to Robert Lampl's office, Rob Dauer and Unkovich & Scott and Robleto law.
7. Debtor is very confident that Chapter 11 plan will be filed and confirmed and asks this court to continue the case and not dismiss.

Sincerely,

Adela Huser Perez

Adelita Enterprises, INC

834 Washington Rd
Pittsburgh PA 15228
412 863 9441

U.S. BANKRUPTCY COURT
PITTSBURGH
CLERK

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